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BY ELECTRONIC MAIL

Honorable Kimba M. Wood
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Wesam El-Hanafi*, 10 Cr. 162 (KMW)

MEMO ENDORSED

Dear Judge Wood:

Further to our letter of March 5, 2014, and the Court's order, please accept this letter as an update on the status of this case. The government has reviewed this letter, concurs with the information provided, and consents to the schedule proposed herein.

At the close of last week, we received the majority of the outstanding medical records in this case. The ultrasound images from New York Downtown Hospital are still outstanding; however, the government has been able to locate a copy of these files, and expects to be able to provide us with a copy by this Friday, March 28. We will also be providing copies all new records in our possession (other than the MCC records that were already provided) to both the Court and the government no later than Friday.

Today, we had a telephone conference with our expert. Given the quantity of materials provided, and our expert's upcoming academic travel schedule, he has revised his estimate, and anticipates that it will take him 10-12 weeks to complete a report, and not the 8-10 weeks he originally estimated. As we wrote in our last update letter, once we receive the report, we anticipate that we will need two weeks to complete our submission.

Given the above, we respectfully request that the Court set July 3, 2014 as the deadline for our submission. This will provide 12 weeks for the completion of the expert report, followed by two weeks for our submission. At this time, the government does not know if the defense submission will require a reply, but in order to move the case forward as expeditiously as possible, will be sharing the new medical records with its expert as soon as we provide them, so that he will have full command of these materials well in advance of our submission.

Thank you for your kind consideration of this request.

Respectfully yours,

Sarah Kunstler

Sarah Kunstler

Rebecca Heinegg

Attorneys for Wesam El-Hanafi

*By July 11, 2014, the Government
shall submit a letter stating how
long they need to prepare a reply,
if they intend to reply. A
sentencing date will be
scheduled thereafter.*

3-25-14

SO ORDERED: N.Y., N.J.

Kimba M. Wood

KIMBA M. WOOD

U.S.D.J.